

EXHIBIT M

Ryan Gorman

From: David Root <david.root@bclplaw.com>
Sent: Thursday, May 1, 2025 6:42 PM
To: Stacylyn Doore
Cc: Keith Klein
Subject: RE: Electric Solidus, Inc. v. Proton Management LTD, et al.; Case No. 2:24-cv-8280
--- Subpoena to Aspen Creek Digital Corporation

[EXTERNAL EMAIL from david.root@bclplaw.com]

Stacylyn,

I just sent you a ShareFile. These documents complete Aspen Creek Digital Corporation's production in response to your client's subpoena. Let me know if you have any issues downloading the documents. Note that the link expires in fourteen days. Thank you.

David



David Root
Attorney
Bryan Cave Leighton Paisner LLP - Irvine, CA USA / Santa Monica, CA USA
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From: David Root <david.root@bclplaw.com>
Sent: Wednesday, April 30, 2025 10:00 PM
To: stacylyndoore@quinnemanuel.com
Cc: Keith Klein <keith.klein@bclplaw.com>
Subject: RE: Electric Solidus, Inc. v. Proton Management LTD, et al.; Case No. 2:24-cv-8280 --- Subpoena to Aspen Creek Digital Corporation

Stacylyn,

I sent you a sharefile that contains Aspen Creek Digital Corporation's production of documents responsive to your client's subpoena. Note that the link expires in fourteen days. We are having some technical difficulties with a few files that are responsive to the subpoena, which we are hoping to resolve shortly. I will send these files as soon as possible. In the meantime, can your office please provide a form custodian of records declaration? Thank you.



David Root
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From: David Root
Sent: Thursday, April 10, 2025 3:39 PM
To: 'stacylyndoore@quinnemanuel.com' <stacylyndoore@quinnemanuel.com>

Stacylyn,

Thank you for the extension of the production deadline, as well the information about RFP 5. We will review the information with our client and let you know if we have further questions. To preserve our client's rights, attached please find Aspen Creek Digital Corporation's ("ACDC") responses and objections to the subpoena. As reflected therein, ACDC intends to comply with the subpoena. And as mentioned below, our client is in the process of collecting responsive documents. Once I've had a chance to review the materials, I can let you know if we can produce the documents on a rolling basis before the April 30 production deadline.

Thank you,

David



David Root
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From: Stacylyn Doore <stacylyndoore@quinnemanuel.com>

Sent: Wednesday, April 9, 2025 4:07 PM

To: David Root <david.root@bclplaw.com>

Cc: Keith Klein <keith.klein@bclplaw.com>; QE-Swan <qe-swan@quinnemanuel.com>

Subject: RE: Electric Solidus, Inc. v. Proton Management LTD, et al.; Case No. 2:24-cv-8280 --- Subpoena to Aspen Creek Digital Corporation

David,

We are happy to accommodate ACDC's request for a two-week extension of the deadline to complete its production of non-privileged documents in response to Swan's subpoena. If possible, we would appreciate if your client could produce any readily-available responsive documents on a rolling basis prior to that April 30 deadline.

In response to the question in your April 4 email regarding RFP 5, that request seeks documents in your client's possession, custody, or control that would identify or otherwise provide information concerning the number and type of ASICs that Proton, Elektron, 2040 Energy, and/or Tether are using to mine Bitcoin at the Liverpool, TX Site. The second part of that request seeks documents from which we could discern the site-wide hash rate of ASICs engaged to mine Bitcoin at that site, for purposes of comparing the number and capabilities of ASICs used by Proton, Elektron, 2040 Energy, and/or Tether to the overall capabilities at the site. If you believe some but not all of the information sought by RFP 5 is available to your client, we're happy to hop on a call and discuss the best way for ACDC to provide that information in response to the subpoena.

Thanks,
Stacylyn

Stacylyn Doore
Partner
Quinn Emanuel Urquhart & Sullivan, LLP

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Boston, MA 02199
617-712-7121 Direct

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From: David Root <david.root@bclplaw.com>

Sent: Monday, April 7, 2025 7:30 PM

To: Stacylyn Doore <stacylyndoore@quinnemanuel.com>

Cc: Keith Klein <keith.klein@bclplaw.com>

Subject: RE: Electric Solidus, Inc. v. Proton Management LTD, et al.; Case No. 2:24-cv-8280 --- Subpoena to Aspen Creek Digital Corporation

[EXTERNAL EMAIL from david.root@bclplaw.com]

Stacylyn,

Following up. Please confirm that you agree to a brief extension of the deadline for Aspen Creek Digital Corporation to produce non-privileged documents in response to the attached subpoena. We request an extension from April 16 **to April 30**. I'm available if you wish to discuss further. Thank you.



David Root

Attorney

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From: David Root

Sent: Friday, April 4, 2025 4:03 PM

To: 'stacylyndoore@quinnemanuel.com' <stacylyndoore@quinnemanuel.com>

Cc: Keith Klein <keith.klein@bclplaw.com>

Subject: Electric Solidus, Inc. v. Proton Management LTD, et al.; Case No. 2:24-cv-8280 --- Subpoena to Aspen Creek

Counsel,

Our office was recently retained by Aspen Creek Digital Corporation with respect to the subpoena issued in the above-entitled matter. Our client is in the process of collecting responsive documents, which we will need to review. Because our client has limited availability to collect responsive materials next week, and I'm traveling the following, we request a two-week extension of the production deadline: i.e., **from April 16 to April 30**. Please confirm agreement to the brief extension.

Also, can you provide some insight regarding the materials you're seeking in response to RFP No. 5?

Thank you,



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